

From: Eric Hanson on behalf of ECFSHelp
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Public Comments on Effect of Communications Towers on Migratory Birds:=====

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General Comment: FCC should not have been issuing permits for towers without necessary baseline bird and bat populations information. Bird and bat populations must be studied in much greater detail and monitored, in order to understand the population trends prior to FCC issuing tower permits. This rulemaking is one step in several necessary to address the affect of towers on wildlife.

Tower operators and the industry should be required to perform ongoing monitoring of the affect of towers on bird and bat populations and to prove individual towers, and the cumulative presence of towers, are not contributing to declines in bird and bat populations.

I support this FCC regulatory action to limit hazards to bird and bat populations that are created by communications towers.

This FCC rule should be amended to require the alteration of the steady lights to strobe lights on existing towers whenever the steady lights burn out. Also, FCC should require applicants to demonstrate the necessity of guy wires on existing and proposed towers, and require all mitigation measures available, such as structural remedies whenever technically possible, in order to minimize bird and bat strikes.

Tower operators should be required as a permit condition, to monitor and provide bird and bat population studies to be submitted to FCC and to the U.S. Fish and Wildlife Service every 3-5 years.

FCC should review all existing tower permit conditions on a five year cycle in order to insure tower operation is meeting the highest standards and towers are evaluated for the elimination of guy wires. Bird and bat population trends observed through industry anti

government monitoring studies for the affect of towers on these species should be addressed by FCC by retiring or alter operating conditions of tower permits, as appropriate.